

**MEMO ENDORSED**

**BRAFMAN & ASSOCIATES, P.C.**

ATTORNEYS AT LAW  
256 FIFTH AVENUE, 2ND FLOOR  
NEW YORK, NEW YORK 10001  
TELEPHONE: (212) 750-7800  
FACSIMILE: (212) 750-3906  
E-MAIL: ATTORNEYS@BRAFLAW.COM

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#: \_\_\_\_\_  
DATE FILED: 4/6/22

BENJAMIN BRAFMAN

MARK M. BAKER  
OF COUNSEL

MARC A. AGNIFILO  
OF COUNSEL

ZACH INTRATER  
OF COUNSEL

ANDREA L. ZELLAN  
JACOB KAPLAN  
TENY R. GERAGOS  
ADMITTED IN NY & CA  
STUART GOLD

April 5, 2022

**VIA ECF**

Honorable Andrew L. Carter, Jr.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, NY 10007  
ALCarterNYSDChambers@nysd.uscourts.gov

Re: United States v. Jacobs, 20 CR 660 (ALC)

Dear Judge Carter:

We write the Court requesting a modification of Mr. Rafael Jacobs's pretrial release conditions; specifically, a modification of Mr. Jacobs's travel restrictions to permit him to travel to the Dominican Republic between April 26, 2022, and May 31, 2022. Mr. Jacobs has not purchased a ticket yet out of deference to this Court's authority.

As the Court may know from prior applications, Mr. Jacobs has a business installing and servicing credit card processing machines. He works with businesses in the Dominican Republic and has taken several trips there in the past (and has always, of course, returned). Mr. Jacobs would like to attend meetings with his counterparties in the Dominican Republic. He has applied for several prior travel modifications, each expanding his range of locations he may go, including two prior applications for travel to the Dominican Republic, and the Court graciously granted each of those requests. Mr. Jacobs, in turn, has returned within the allotted time from each trip, and has scrupulously abided by all his bail conditions.

BRAFMAN & ASSOCIATES, P.C.

We have communicated with the Government (AUSAs Samuel Raymond and David Felton) and Pretrial Services (PTO Viosanny Harrison). The Government and Pretrial Services each have no objection, which Mr. Jacobs appreciates very much.

Thank you for your consideration.

Respectfully submitted,

s/

Marc Agnifilo  
Zach Intrater

cc: AUSAs Samuel Raymond & David Felton (via email)  
Pretrial Services Officer Viosanny Harrison (via email)

The application is  granted.  
 denied.

Andrew L. Carter Jr.  
Andrew L. Carter Jr, U.S.D.J.  
Dated: April 6, 2022  
NY, New York